

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

19-CR-1631 KWR

**JOHNATHAN CRAFT, a.k.a.
“Jonathan Craft,” a.k.a., “YN,”
a.k.a. “Wayan,”**

Defendant.

**JOHNATHAN CRAFT AND KAMAL BHULA’S JOINT NOTICE OF JOINDER IN CO-
DEFENDANT EDDIE HILL’S OMNIBUS MOTION IN LIMINE (DOC. 135)**

Defendants Johnathan Craft, by and through his undersigned counsel, and Defendant Kamal Bhulahereby submits Notice of Joinder in Co-Defendant Eddie Hill’s Omnibus Motion in Limine (Doc. 135). Specifically, Mr. Craft and Mr. Bhula join in the following specific motions or requests for relief set forth in Doc. 135:

1. Motion to Exclude Expert Testimony of FBI Special Agent Carrie Landau.

Defendants Craft and Bhula agree that the proposed expert testimony of Carrie Landau does not pass muster under Daubert or under Fed. R. Evid. 702. For the reasons stated in Doc. 135 at pages 4-6, Defendants Bhula and Craft also object to the admission of her testimony and request that it be excluded.

2. Motion to Allow Cross Examination of Alleged Victims Past Sexual Conduct under Rule 412(b). Defendants Craft and Bhula join this motion as set forth in Doc. 135 at pages 6-8.

3. Motion to Order Disclosure of Identities of Jane Doe Victims. Defendants Craft and Bhula join this motion as set forth in Doc. 135 at page 8-9.

4. Finally, Defendants Bhula and Craft concur with the statement of Defendant Eddie Hill regarding COVID-19 and its impact on the Defendants and the preparation of a defense in this case. Both Bhula and Craft are in custody in Cibola County Corrections Center. Mr. Craft has been cruelly held in segregation since December. Mr. Bhula has faced severe health challenges in custody and is at high risk of serious complications from COVID-19. The restrictions in CCCC have rendered trial preparation impossible.

Respectfully Submitted,

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Attorney for Defendant Kamal Bhula

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of August 2020, I filed the foregoing pleading via CM-ECF, causing all registered parties to be served.

/s/ Marshall J. Ray
Marshall J. Ray

